

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Pennsylvania

United States of America

v.

Richard Chase Hoover

)

Case No.

18-773-M

FILED

MAY 17 2018

Defendant(s)

KATE BARKMAN, Clerk  
By \_\_\_\_\_ Dep. Clerk**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 17, 2018 in the county of Philadelphia in the  
Eastern District of Pennsylvania, the defendant(s) violated:

*Code Section**Offense Description*

21 U.S.C. § 841(a)(1), (b)(1)(A) Possession with intent to distribute 5 kilograms or more of a substance  
 containing a detectable amount of cocaine

This criminal complaint is based on these facts:

See attached Affidavit

Continued on the attached sheet.



Complainant's signature

William J. Becker IV, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

*TR*  
Date:

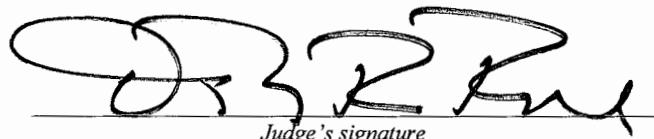
5.18.18

City and state:

Philadelphia, Pennsylvania

Honorable Timothy R. Rice, Magistrate Judge

Printed name and title



Judge's signature

18-773-m

**AFFIDAVIT**

I, William J. Becker IV, Special Agent, Federal Bureau of Investigation ("FBI"),

**FILED**

Philadelphia, Pennsylvania, being duly sworn, state:

MAY 17 2018

**AFFIANT'S TRAINING AND EXPERIENCE**By KATE BARKMAN, Clerk  
Dep. Clerk

1. I am an "investigative or law enforcement officer" as defined in 18 U.S.C. § 3051, as such, I am a law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7), and am empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in 18 U.S.C. § 2516.

2. I am a Special Agent ("SA") with the Federal Bureau of Investigation ("FBI"), Philadelphia Field Division and have been employed by the FBI since March 2017. I have received specialized training from the FBI, including training in the investigation and identification of narcotics traffickers and violent gangs. During my tenure with the FBI, I have been assigned to the High Intensity Drug Trafficking Area ("HIDTA")/Safe Streets Violent Drug Gang Task Force ("SSVDGTF") of the Philadelphia Division, which investigates, among other violations of federal law, violent drug gangs and criminal organizations including those involved in the importation, distribution and manufacturing of controlled substances, Hobbs Act violations, outlaw motorcycle gangs, and homicides and shootings resulting from the drug trade. Prior to my employment with the FBI, I served as a Police Officer with the Whitpain Township Police Department, Montgomery County, Pennsylvania from September 2010 until March 2017. During my tenure with the Whitpain Township Police Department, I received specialized training in narcotics enforcement, and served as a Task Force Officer with the Montgomery County Drug Task Force. While a police officer and an agent, I have investigated numerous firearms violations, drug violations, and other related crimes. I have conducted physical and

electronic surveillance, debriefed confidential sources, analyzed information obtained from court-authorized pen register and trap and trace intercepts, and participated in the drafting and execution of search warrants involving these matters. I am an active investigator for the FBI Gangs and Criminal Enterprise Program in which state and local arrests for drugs and firearms violations are reviewed and referred for possible federal prosecution. I have specialized training and experience in drug smuggling and distribution investigations, including but not limited to, the means and methods used by traffickers to import and distribute drugs, interdiction, smuggling methods, and the concealment and laundering of proceeds from illicit drug trafficking activities. I have participated in numerous drug investigations, debriefed or participated in debriefings of numerous defendants, informants and witnesses who had personal knowledge regarding major drug trafficking organizations, and have participated in all aspects of drug investigations including conducting surveillance, analyzing information obtained from court-ordered pen register and trap and trace intercepts, and analyzing telephone toll information obtained as a result of subpoenas issued by the FBI.

3. Based on the facts set forth below, I have probable cause to believe that RICHARD CHASE HOOVER committed the following violation: 21 U.S.C. § 841(a)(1), (b)(1)(A) (possession with intent to distribute 5 kilograms or more of cocaine, a Schedule II controlled substance).

**DETAILS OF THE INVESTIGATION**

1. On May 3, 2018, electronic tracking surveillance data on the phone subscribed to RICHARD CHASE HOOVER (702-586-6012) indicated that he was in the vicinity of the One Water Street Apartments, 250 N. Christopher Columbus Blvd, Philadelphia, PA. Law enforcement later learned that a Deangelo Smith had leased apartment #717 at One Water Street

Apartments and had given permission to One Water Street Apartments to provide a set of keys to that apartment to CHASE HOOVER. Investigators also learned that RICHARD CHASE HOOVER picked up the keys to newly leased Apartment #717 on behalf of a "Deangelo Smith", which identity was found to be false.

2. On May 4, 2018, electronic tracking surveillance data indicated that HOOVER was travelling west, and on May 8, 2018 he arrived in Los Angeles, California. On May 11, 2018 at approximately 8:00AM PDT, investigators established surveillance in the vicinity of the 5300 block of W Centinela Ave, Los Angeles, CA, where the red Volvo truck was parked. At approximately 2:40PM PDT, HOOVER was observed exiting the truck empty-handed and walking away from the area. Approximately one hour later, HOOVER was observed walking east on W Centinela Ave towards the red Volvo truck, carrying a large black duffel bag. HOOVER was then observed placing the dark duffel bag inside the cabin of the red Volvo truck, then walking back west on W Centinela Ave. Approximately 40 minutes later, HOOVER was observed returning to the red Volvo truck and moving items around the cabin area of the truck. On May 11, 2018, electronic tracking surveillance data on the red Volvo truck, as well as on the telephone utilized by HOOVER, indicated that the truck and telephone were travelling east across the United States, on a logical travel route to Philadelphia, PA.

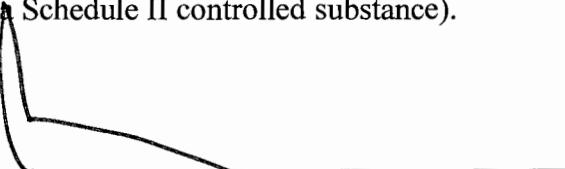
3. On May 15, 2018, the Honorable Timothy R. Rice authorized anticipatory search warrants for Apartment #717 of the One Water Street Apartments (250 N. Columbus Boulevard, Philadelphia) subject to a condition precedent as follows: that RICHARD CHASE HOOVER arrives in Philadelphia, PA in a red Volvo truck, and thereafter travels to the building of 250 N. Christopher Columbus Boulevard carrying containers large enough to contain kilogram quantities of Narcotics.

4. On May 16, 2018, the red Volvo truck was observed parking in the lot of 3699 South Lawrence Street, Philadelphia, PA. HOOVER was observed exiting the driver's seat of the red Volvo and placing a rolling style suitcase into the passenger area of a white Chevrolet Trailblazer. HOOVER was then observed entering the driver's seat of the Chevrolet and was followed to the vicinity of the One Water Street Apartments (250 N Christopher Columbus Boulevard, Philadelphia, PA). HOOVER was then observed removing a rolling style suitcase from the passenger area of the white Chevrolet and transporting it into Apartment #717 of the One Water Street Apartments.

5. On May 17, 2018, a federal search warrant was executed at Apartment #717 of the One Water Street Apartments (250 N. Christopher Columbus Boulevard, Philadelphia, PA). During the course of the search, 10 brick style kilograms of cocaine, 6 pounds of methamphetamine, and \$20,000 in United State Currency were located in the same rolling style suitcase that HOOVER was observed moving from the red Volvo truck into the Chevrolet and transporting into Apartment #717. Both substances were field tested and returned positive for the presence of cocaine and methamphetamine. In addition, packaging materials, a heat sealer, and manitol white powder were also seized. RICHARD CHASE HOOVER was the sole occupant inside the apartment at the time of the execution of the search warrant.

**CONCLUSION**

6. Wherefore, based on my training and experience, and my knowledge of the investigation, I have probable cause to believe, and do so believe, that RICHARD CHASE HOOVER committed the following violation: 21 U.S.C. § 841(a)(1), (b)(1)(A) (possession with intent to distribute 5 kilograms or more of cocaine, a Schedule II controlled substance).

  
Special Agent William J. Becker IV  
Federal Bureau of Investigation

Sworn to before me this  
17<sup>th</sup> day of May, 2018

  
Honorable Timothy R. Rice  
United States Magistrate Judge